

Gomes, Kristen@Waterboards

From: Jeff Monaco <jmonaco@kwrarecycles.net>
Sent: Wednesday, February 22, 2017 9:32 AM
To: Gomes, Kristen@Waterboards; Gomes, Kristen@Waterboards
Cc: Carlson, Daniel@Waterboards
Subject: Houston Avenue Tentative Waste Discharge Requirements

Hello Kristen.

Time got away from me and I must resort to emailed comments for the subject tentative WDRs.

Finding number 27: It appears that the description of first encountered groundwater depth is inconsistent with the description of the upper and lower ground water aquifers separated by the A-clay layer.

Post-Closure Maintenance Specification D3: It does not seem reasonable to be required to comply with all provisions of SPRR section G. Many of these provisions do not apply to the Houston Avenue landfill and it will not be possible to comply with other provisions which would immediately put the site in non-compliance.

Monitoring Specification F6: We're not sure a WQPS can be updated if there's no groundwater chemistry data available due to lowering water levels. I'm also not sure there's enough time to perform the evaluation by 11/1/17. A new DMP that includes new WQPS will take longer. Please allow a review of the DMP with our recommendations and a schedule for implementing the recommendations to be submitted.

M&RP:

Page 1, Section A: Consider deleting the references to "surface water" in the first and second paragraphs since surface water monitoring is not required in the remainder of the M&RP.

Page 1, Section A, 2nd Paragraph: Consider replacing the reference to "leachate" with "seeps" since there are no dedicated leachate monitoring points.

Page 7, Section B(1)(h): Consider deleting the reference to "leak search" in the first sentence. The requirement for performing a periodic leak search started with 27CCR. Since closure of the landfill occurred prior to 27CCR, it seems that this requirement should not apply.

Page 14, Table II: Consider specifying that the methane monitoring can be done in the field using a calibrated portable meter.

Page 15, Table III:

- Not clear that footnote number 1 is needed since flow rate must be reported in gallons per day (GPD).
- Consider adding a footnote to "Sampling Frequency" header clarifying that sampling frequency applies to period in which the leachate seep(s) is active.
- We suggest reducing the "Field Parameters" to Total Flow and Flow Rate and the "Monitoring Parameters" to VOCs.
- Under the revised scope of testing recommended above, consider changing the sampling frequency for VOCs to "Once/Seep".

In addition to the above, I noticed that Page 13, Section E of the WDR (Financial Assurance Specifications) states that the "Discharger shall provide the funds necessary for corrective action and postclosure maintenance ...". This could imply that separate financial assurance mechanisms must be established for corrective action and postclosure maintenance, which is not correct since the landfill was formally closed prior to requirement to establish financial assurance mechanisms. Since there is apparent room for interpretation as currently worded, I think it would be prudent to get this clarified and make sure that it does not commit KWRA to establishing financial assurance mechanisms.

Lastly, in general, 27CCR is referenced throughout the WDR, M&RP and Standard Provisions. However, based on the landfill's closure prior to the adoption of 23CCR, Chapter 15 (November 1984), it seems that the landfill should only be subject to those requirements of 27CCR that are consistent with those regulations that were enforce when the landfill was formally closed. The blanket referencing of 27CCR is too encompassing and should only be used when its application is appropriate.

Thanks for allowing our input.

Let me know if you have any questions.

Jeff Monaco, Executive Director